

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

STACY ARNOLD,

Plaintiff,

v.

Case No. 5:19-CV-06137-BP

CITY OF ST. JOSEPH, ST. JOSEPH  
PUBLIC LIBRARY and OFFICER  
REBECCA HAILEY,

Defendants.

**DECLARATION OF ROGER CLARY**

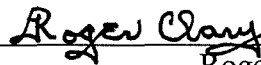
COMES NOW, Roger Clary, upon his oath and upon penalty of perjury, and states as follows:

1. I am above the age of 18, have personal knowledge of the facts contained in this declaration, and am competent to testify as to the facts stated herein.
2. I am a security guard for East Hills Mall.
3. On January 30, 2018, East Hills Mall Security was called by library staff at the East Hills Library, a library within the St. Joseph Public Library branch. The Library staff member contacted the East Hills Mall Security concerning complaints she received from library patrons about solicitation or being bothered by a woman, Ms. Arnold, as they were getting out of their vehicles in the parking lot in front of the library.
4. I and another security guard for the East Hills Mall, Zachary Langford, arrived near the library to address the concerns. When we arrived, Ms. Arnold was soliciting on Mall property, in the parking lot.

5. Officer Langford and I approached Ms. Arnold and asked Ms. Arnold to leave the property, as soliciting on Mall property without permission was not allowed.
6. Ms. Arnold refused to leave the Mall property, arguing with us Security officers and becoming almost belligerent.
7. We called the St. Joseph Police Department's non-emergency line and asked for an officer to assist with our situation.
8. When St. Joseph Police Department Officer Hailey and Officer Kneib arrived at the scene, Ms. Arnold still refused to leave.
9. Officer Hailey asked us, the Mall Security Officers, if we wanted to prosecute Ms. Arnold for trespassing. It was apparent to me that Ms. Arnold was not going to leave the property voluntarily. As such, we told Officer Hailey that the Mall would like to prosecute Ms. Arnold. Officer Hailey then arrested and transported Ms. Arnold from the scene in her police vehicle.
10. There was no conspiracy between me and Officer Hailey to deprive Plaintiff of any of her Constitutional rights.
11. There was no fabrication of evidence performed by me in recording the January 30, 2018 incident in writing.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Further declarant sayeth not.

Executed on September 28, 2020.



Roger Clary